

BILL OF COMPLAINT

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

NO. 16357 EQUITY

HARRY M. RODERICK and
EULA I. RODERICK, his wife
PLAINTIFFS

VS.

ELMER E. RODERICK and
NELLIE RODERICK, his wife;
RAYMOND L. RODERICK and
MARY EMMA RODERICK, his wife;
NELLIE M. SPURRIER and
STERLING E. SPURRIER, her husband;
BESSIE G. VAN SANT and
JAMES R. VAN SANT, her husband;
EDITH W. YOUNG and
SAMUEL H. YOUNG, her husband;
WALTER EUGENE STONE, widower;
VIOLA RODERICK, widow;
ANDREW V. RODERICK and
SALLY J. RODERICK, his wife;
ELIZABETH RODERICK FOX and
BENJAMIN H. FOX, her husband;
HELEN RODERICK NICODEMUS and
EDGAR NICODEMUS, her husband;
CAROLINE M. FEAGA, infant, and
GARLAND P. FEAGA, her husband;
ROGER CARROLL RODERICK, infant;
COMMERCIAL STATE BANK OF FREDERICK, MD.,
later known as COMMERCIAL BANK OF MARYLAND;
WALTER EUGENE STONE, Administrator of the
Estate of Ruth G. Stone, deceased;
HARRY M. RODERICK, Administrator of the
Estate of Clara V. Roderick, deceased;
HARRY M. RODERICK, ELMER E. RODERICK and
RAYMOND L. RODERICK, surviving Trustees
under the Last Will and Testament of
William Mc. Roderick, deceased
DEFENDANTS

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Harry M. Roderick and Eula I. Roderick, his wife,
respectfully show unto your Honors:

FIRST: That they are the owners, in fee simple, of all that tract or
parcel of land, with improvements thereon, situate, lying and being in Urbana
Election District, Frederick County, Maryland, on the road leading from Urbana
to Thurston, in said County and State, and that they acquired said tract or
parcel of land from Andrew M. Roderick and A. Viola Roderick, his wife, by Deed
dated April 13, 1926, and recorded in Liber 358, folio 71, one of the Land
Records of Frederick County, a certified copy of which said Deed is filed here-
with as a part hereof and marked "Complainants' Exhibit A."